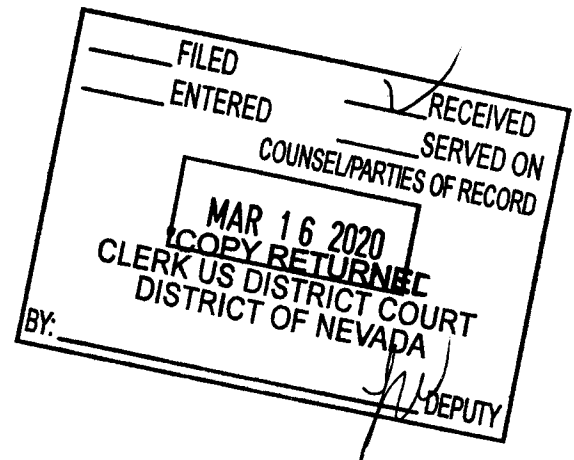


Capt. James Linlor, pro se
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No opposing party
Request for LEAVE of Court to file Complaint



**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

3:20-CV-00165

<p>CAPT. JAMES LINLOR, pro se</p> <p>Plaintiff,</p> <p>v. (proposed)</p> <p>NEVADA SECRETARY OF STATE THE STATE OF NEVADA</p> <p>Defendant</p>	<p>) Case No.: n/a</p> <p>) PETITION FOR LEAVE OF COURT TO FILE</p> <p>) REQUIRED DUE TO FALSELY ALLEGED</p> <p>) VEXATIOUS LITIGANT LISTING</p> <p>) PROPOSED CASE: INJUNCTIVE RELIEF</p> <p>) FOR ENFORCEMENT OF MINNESOTA</p> <p>) VOTERS ALLIANCE v. MANSKY S.Ct. 16-</p> <p>) 1435, WHERE NEVADA HAS PREVIOUSLY</p> <p>) DISENFRANCHISED VOTERS ACROSS</p> <p>) NEVADA (INCLUDING PETITIONER) AND</p> <p>) CONFIRMS NEVADA'S INTENT TO</p> <p>) CONTINUE THIS PRACTICE IN FEDERAL</p> <p>) AND STATE ELECTIONS</p>
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1. Petitioner Capt. James Linlor seeks LEAVE OF THE COURT and permission to file a Complaint for injunctive relief to enforce SCOTUS' mandatory precedent from MINNESOTA VOTERS ALLIANCE v. MANSKY S.Ct. 16-1435, published in June 2018.
2. Petitioner Linlor requires this leave because he was improperly named a "vexatious litigant" by a California Superior Court in April 2019, despite evidence and admissions of opposing counsel

1 that the counsel Mark Hansen (from Utah) was knowingly performing unlicensed practice of
2 law in California, and that material perjury and fraud of evidence and witnesses were submitted
3 to that court. Mark Hansen is further under criminal investigation for related crimes. That
4 Court declined to stay its vexatious litigant ruling pending appeal.

- 5
6 3. The prior “vexatious litigant” ruling is currently on-appeal in California (and has been since
7 April 2019), but no hearing date has yet been set, and the timing of this MINNESOTA
8 disenfranchisement issue requires a ruling in time for implementation in the November 2020
9 General Election. Petitioner seeks injunctive relief to require the Nevada Secretary of State to
10 comply with the Minnesota ruling (S.Ct. 16-1435).
- 11
12 4. The Nevada Secretary of State (SoS) and her staff have admitted in emails and on-the-record
13 phone calls that they have willfully not complied with Minnesota, and **intend to continue to**
14 **not comply** in November 2020’s General (national) election, including candidates for the office
15 of President of the United States.
- 16
17 5. The Nevada SoS has stated that on the advice of their internal SoS attorneys, that they will
18 REFUSE to comply with the Minnesota ruling (S.Ct. 16-1435) in November 2020’s General
19 Election.
- 20
21 6. The Nevada SoS has refused (on-the-record) to comply with lawful public records requests
22 from January 14, 2020 and repeated multiple times since then (despite compliance mandated
23 under Nevada Revised Statutes) **to disclose the internal Nevada SoS attorneys’ arguments**
24 **purporting to justify SoS violations of mandatory precedent contrary to the Minnesota ruling**
25 **(S.Ct. 16-1435).**
- 26
27 7. Petitioner has standing to file the proposed Complaint because he was one of “many” voters
28 (according to the Nevada SoS) who were disenfranchised “as a matter of SoS policy” (per the
SoS’ office) in the November 2018 federal election.

8. Petitioner has repeatedly sought amicable resolution of this issue without litigation, but the Nevada SoS's office refuses to discuss the matter, yet brazenly promises to continue to obstruct and not comply with the Minnesota ruling (S.Ct. 16-1435). The impact of the Nevada SoS's continued actions will be to unconstitutionally disenfranchise voters across Nevada in the November 2020 and future General Elections (as well as local, Nevada State Elections, where federal election and Civil Rights laws take precedence and overcome local, Nevada SoS "Jim Crowe" practices contrary to S.Ct. 16-1435.

PROPOSED ORDER

This Court finds that sufficient cause and benefit to all Citizens exists from Petitioner Linlor's request, that LEAVE IS HEREBY GRANTED to Capt. James Linlor to file a Complaint for the proposed topic in Nevada District Court. Given the public's interest in lawful suffrage and compliance by Nevada with mandatory precedent, no bond or other extraordinary fees shall be assessed to Capt. Linlor during the proposed case.

This Petition and LEAVE TO FILE are hereby GRANTED.


Signature: _____ Date: _____

Judge: _____

Submitted this 13th day of March, 2020 in Reno, Nevada.

I certify under penalty of perjury that all statements in this filing are true-and-correct.

Capt. James Linlor, pro se
PO Box 1812, Zephyr Cove, NV 89448
(775) 298-1505

Signature: 
Printed: James Linlor Date: 3/13/20